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*Attorneys for T1 Payments LLC, T1 Payments Ltd.,
TGlobal Services Ltd., Donald Kasdon, Amber Fairchild,
and Debra King*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

T1 PAYMENTS LLC, a Nevada limited liability
company,

Plaintiff,

vs.

NEW U LIFE CORPORATION, a California
corporation,

Defendant.

NEW U LIFE CORPORATION, a California
corporation,

Counterclaimant,

vs.

T1 PAYMENTS LLC, et al.,

Counterclaim-Defendants.

CASE NO. 2:19-cv-01816-APG-DJA

**JOINT STIPULATION REGARDING
TIMING FOR BRINGING
CONFIDENTIALITY DESIGNATION
MOTIONS UNDER ECF Nos. 92-93**

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Plaintiff and counterclaim-defendant, T1 Payments LLC; counterclaim-defendants T1 Payments Limited, TGlobal Services Limited, Donald Kasdon, Amber Fairchild, and Debra King (the “T1 Parties”); and defendant and counterclaimant New U Life Corp. (collectively, the “Parties”), submit this joint stipulation regarding the timing to bring a motion under the Joint Stipulated Protective Order, ECF Nos. 92 and 93. Discovery is stayed as to Payvision, B.V. and the relief sought does not affect Payvision. Thus, Payvision is not included in this joint stipulation.

On February 2, 2021, T1 Payments and New U Life filed a joint stipulation and proposed order for protection of confidential information disclosed during discovery (ECF No. 92), which the Court entered on February 3 (ECF No. 93). The joint stipulation provides a procedure for designating materials produced during discovery confidential, as well as challenging the confidentiality designation. (See ECF No. 92 at 3–6.) To challenge another party’s confidentiality designation, the parties must hold a meet and confer to attempt to resolve the challenge in good faith. If the parties cannot resolve a challenge, the protective order states that the party designating confidentiality “may file and serve a motion to retain confidentiality by no later than 14 days after the parties first meet and confer...” (Id. at 6, Section 4(c).)

The Parties’ counsel met and conferred on December 14, 2021, regarding mutual challenges to confidentiality designations. The Parties were unable to resolve their mutual challenges and therefore wish to bring motions to retain confidentiality. However, the deadline for bringing such motions is currently December 28, 2021. Due the holidays and the Parties’ counsel’s schedules, the Parties have agreed to extend the deadline to bring such motions until January 11, 2022.

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Dated this 16th day of December, 2021.

KAPLAN COTTNER

JANE B. BABER (*pro hac vice*)

By: /s/ Brianna Dahlberg

*Attorneys for Defendant and Counterclaimant
New U Life Corporation*

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: December 17, 2021